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 6 *Counsel for Defendant BUILD OUR CENTER*

5  
 6 UNITED STATES DISTRICT COURT  
 7 DISTRICT OF NEVADA

8 DREW RIBAR,

9 Plaintiff,

10 Case No. 3:24-cv-00526

11 v.

12 WASHOE COUNTY; WASHOE COUNTY LIBRARY  
 13 SYSTEM; JEFF SCOTT; THANH NGUYEN; JAMIE  
 14 HEMINGWAY; BEATE WEINERT; STACY  
 15 MCKENZIE; JONNICA BOWEN; BEN WEST;  
 16 BUILD OUR CENTER, INC.; STACEY SPAIN;  
 17 ANGELINE PETERSON; CHRISTOPHER DANIELS;  
 18 DEPUTIES ROTHKIN, SAPIDA, GOMEZ; KRISTEN  
 19 RYAN, JENNIFER COLE; and JOHN/JANE DOES  
 20 1-10;

21 **DEFENDANT**  
**BUILD OUR CENTER'S**  
**MOTION FOR LEAVE**  
**TO EXCEED PAGE**  
**LIMITS**

22 Defendants.

23  
 24 Defendant BUILD OUR CENTER INC., by and through its undersigned  
 25 counsel, and pursuant to R 7.3, respectfully requests the Court allow it to exceed  
 26 the twenty-four-page limits for motions.

27 This motion is made and based upon all pleadings and records on file in  
 28 this proceeding, the *Declaration of Alison R. Kertis, Esq.* which is attached hereto  
 1 as **Exhibit 1** together with every other exhibit mentioned herein (each of which  
 2 is incorporated herein), as well as the points and authorities set forth directly  
 3 below.

4  
**POINTS AND AUTHORITIES**

5 Good cause exists to enlarge the page limit for Build Our Center's Motion  
 6 for Preliminary Injunction.

7 Under LR 7.3(b), motions other than summary judgment are limited to 24  
 8 pages. Although LR 7.3(c) provides that the Court disfavors requests to exceed

1 that limit, a court may grant a request to exceed page limit upon a showing of  
2 good cause. That standard is met here.

3 Counsel has diligently worked to keep the Motion for Preliminary  
4 Injunction as concise as possible while still presenting and preserving the factual  
5 record and legal authority necessary to protect BOC's rights. [Dec. Kertis, Ex. 1  
6 at ¶ 5-8.] Given the scope of Mr. Ribar's conduct, the need to detail on the record  
7 multiple instances of harassment, doxing, and stalking, and the complexity of  
8 the legal issues implicated—including statutory claims, constitutional  
9 considerations, and the standards governing injunctive relief—BOC must  
10 include substantial factual development and legal analysis for the Court to fully  
11 and accurately evaluate the request for emergency relief.

12 Because the issues are urgent and cannot be adequately addressed within  
13 the 24-page limit, BOC respectfully requests a modest extension to  
14 approximately thirty-five (35) pages. This limited enlargement is necessary to  
15 ensure the Court receives a complete and coherent presentation of the facts and  
16 law relevant to BOC's motion.

17 DATED November 17, 2025.

18 SIERRA CREST BUSINESS LAW GROUP

19  
20 By: /s/ Alison R. Kertis  
21 Jerry C. Carter, Esq. (NSB 5905)  
jcarter@sierracrestlaw.com  
22 Alison R. Kertis, Esq. (NSB 13875)  
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23 Counsel for Defendant BUILD OUR CENTER

1 **CERTIFICATE OF SERVICE**

2 I certify that I am an employee of the SIERRA CREST BUSINESS LAW  
3 GROUP who, on the below-written date, caused a true copy of the foregoing to  
4 be transmitted via email and also to be filed using the above-entitled Court's  
5 electronic filing (CM/ECF) system which will automatically e-serve the same) on  
6 the person(s) and/or entity(ies) set forth directly below:

7 **Drew Ribar**

8 480 Pershing Lane, Washoe Valley, NV 89704  
9 [const2audit@gmail.com](mailto:const2audit@gmail.com)  
10 (775) 223-7899  
11 Plaintiff *in propria persona*

12 **Lindsay L. Liddell** (SBN 14079)

13 **Andrew Cobi Burnett** (SBN 16505)  
14 DEPUTY DISTRICT ATTORNEYS  
15 One South Sierra Street, Reno, NV 89501

16 [lliddell@da.washoecounty.gov](mailto:lliddell@da.washoecounty.gov)  
[cburnett@da.washoecounty.gov](mailto:cburnett@da.washoecounty.gov)

17 (775) 337-5700

18 *Counsel for Plaintiffs Washoe County and its Library  
19 System, Jeff Scott, Stacy Mckenzie, Jonnica Bowen,  
20 Jennifer Cole; Deputy C. Rothkin, Deputy R. Sapida,  
21 and Sgt. George Gomez*

22 DATED: November 17, 2025.

23 /s/ Veronica Campos

24 an employee of the  
25 SIERRA CREST BUSINESS LAW GROUP

## **INDEX OF EXHIBITS**

to

DEFENDANT BUILD OUR CENTER'S  
MOTION FOR ~~

re

*Ribar vs. Washoe County, et alia*  
(Case No. 3:24-cv-00526)

Exhibit No.	Exhibit Description	Pages (+ Cover)
1.	Declaration of Alison R. Kertis, Esq.	3